

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
RS FIT NW LLC,)	
)	Case No. 20-11568 (KBO)
Debtor.)	(Jointly Administered)
_____)	
)	
24 HOUR FITNESS WORLDWIDE, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
CONTINENTAL CASUALTY COMPANY;)	Adv. Pro. No. 20-51051 (KBO)
ENDURANCE AMERICAN SPECIALTY)	
INSURANCE COMPANY; STARR SURPLUS)	
LINES INSURANCE COMPANY; ALLIANZ)	
GLOBAL RISKS US INSURANCE COMPANY;)	
LIBERTY MUTUAL INSURANCE COMPANY;)	
BEAZLEY-LLOYD'S SYNDICATES 2623/623;)	
ALLIED WORLD NATIONAL ASSURANCE)	
COMPANY; QBE SPECIALTY INSURANCE)	
COMPANY; and GENERAL SECURITY)	
INDEMNITY COMPANY OF ARIZONA,)	
)	
Defendants.)	
_____)	

**PROPERTY INSURER DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND
INCORPORATED MEMORANDUM OF LAW**

EXHIBIT A-12

*Email from Matt Piro to Jason Carter, Meredith Klausner,
Dan Larson, Tiffany Shugrue RE: Closed Club Cleaning Checklist_UPDATED
(Deposition of Dan Larson, Exhibit 11)
24HF_Production_0034832-24HF_Production_0034833*

Message

From: Matt Piro [MPiro@24hourfit.com]
Sent: 5/5/2020 5:59:52 PM
To: Jason Carter [jcarter@24hourfit.com]; Meredith Klausner [mklausner@24hourfit.com]
CC: Dan Larson [dlarson@24hourfit.com]; Tiffany Shugrue [tshugrue@24hourfit.com]
Subject: RE: Closed Club Cleaning Checklist_UPDATED
Attachments: ClosedClubCleaningChecklist_5.02.docx

A few minor updates here. I think for the facemasks we should be less restrictive on design. If they have one that isn't solid colored, or has their favorite sports team or something, it wouldn't seem to me like we should prevent them from wearing that...especially early on as we are working to procure PPE items. Seems like we should err on the side of allowing them to use their own as long as it doesn't have something on it that would be offensive or misaligned with our brand...thoughts?

From: Jason Carter <jcarter@24hourfit.com>
Sent: Sunday, May 3, 2020 11:57 AM
To: Meredith Klausner <mklausner@24hourfit.com>; Matt Piro <MPiro@24hourfit.com>
Cc: Dan Larson <dlarson@24hourfit.com>; Tiffany Shugrue <tshugrue@24hourfit.com>
Subject: Closed Club Cleaning Checklist_UPDATED

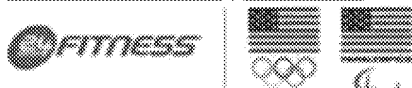
Team,

Updated cleaning checklist for the 30-minute deep cleans. Worked through a few final tweaks with the GM & DM team. Overall I think it looks really good. Might be worth adding to the appendix for the comprehensive Zones presentation.

The yellow highlight specific to the TM mask selection can easily be modified depending on where we land.

Let me know if you have any questions.

Jason Carter
 Regional Vice President | Region 102
 24 Hour Fitness USA, Inc.
24hourfitness.com | 24life.com



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30-Min Cleaning Closure Checklist

Club: _____ Date: _____

Time	Front Desk Team		Zone Cleaners (including Fitness Team)		Traffic Controllers	Other/Misc.
	Front Desk, Lobby & Retail	Sales Area	Weight/ Cardio Floor	GX & Basketball Court	Locker Room	
6:00 am – 6:30am						
7:30am – 8:00am						
9:00am – 9:30am						
10:30am – 11:00am						
12:00pm – 12:30pm						
1:30pm – 2:00pm						
3:00pm – 3:30pm						
4:30pm – 5:00pm						
6:00pm – 6:30pm						
7:30pm – 8:00pm						
End of Day Closing						

*** Please initial each box upon completion, GM to verify efficiency/success. ***

Items team members will need:

- * Face Mask & Gloves
- * Morning Mist spray bottle & paper towels
- * Mop & bucket with Stride cleaning solution

Cleaning Protocols:

- * The General Manager should be monitoring the front door and is responsible for the safe exit of all members/guests prior to closure.
- * Make sure your mask and gloves are always on when cleaning. Dispose of gloves after every round of cleaning.
- * Each team member will clean specific areas of the club based on assigned grouping.

⇒ **Front Desk/Retail Area/Coolers/Vending Machines:** all countertops, shelves, door handles and any other high-touch area are to be sprayed with Morning Mist, wait 10 minutes and then wipe off with a paper towel.

(Estimated Time: 5 min Estimated People Required: 1 person)

⇒ **Sales Area:** all desks/computers/chairs sprayed with Morning Mist, wait 10 minutes and then wipe off with a paper towel.

(Estimated Time: 5 min Estimated People Required: 1 person)

⇒ **Weight/Cardio Floor:** all equipment to be sprayed with Morning Mist, wait 10 minutes and then wipe off with a paper towel. Mop stretch mats with cleaning solution, wait 10 minutes and then wipe off with a paper towel.

(Estimated Time: 15 min Estimated People Required: 2 people)

⇒ **GX/Basketball Court:** all equipment to be sprayed with Morning Mist, wait 10 minutes and then wipe off with a paper towel.

(Estimated Time: 10 min Estimated People Required: 1 person)

⇒ **Locker Rooms:** countertops/lockers/restrooms to be sprayed with Morning Mist, wait 10 minutes and then wipe off with a paper towel.

(Estimated Time: 10 min Estimated People Required: 1 person)

* Check/restock all supplies in club: Toilet paper, hand soap, toilet seat covers, paper towels, Morning Mist & hand sanitizer. To be completed during workout times

* Before reopening, ensure all team members have put away all cleaning materials and washed their hands